

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

v.

RAMIZ HODZIC, SEDINA UNKIC
HODZIC, NIHAD ROSIC, MEDIHA
MEDY SALKICEVIC, and ARMIN
HARCEVIC

Defendants.

Case No. 4:15 CR 49 CDP
(DDN)

**DEFENDANTS' JOINT MOTION FOR LEAVE TO RESPOND TO THE
GOVERNMENT'S OBJECTIONS TO THE MAY 9, 2018 ORDER AND
RECOMMENDATION**

Defendant Ramiz Hodzic through his attorney, Assistant Federal Public Defender Diane L. Dragan, moves on behalf of all codefendants for leave to file a response to the government's Objections to the Magistrate Court's Order and Recommendation Regarding Lawful Combatant Immunity Defense. In support of this motion he states:

1. Hodzic's attorney has conferred with all codefendants' attorneys and learned that all join this request for leave to respond to the government's objections.

2. Hodzic's attorney has also spoken with Assistant United States Attorney Matthew Drake and learned that the government does not object to

defendants' request to respond to the objections nor does the government object to the proposed due date for this response.

3. Given the importance and complexity of the combatant immunity defense issues, defendants believe that they will need 21 days to draft and file a response. If they can file it more promptly, they will.

WHEREFORE, Defendant Hodzic respectfully requests that the Court permit defendants to file a response to the government's objections and directed that it be filed on or before Wednesday, June 20, 2018.

Dated June 1, 2018.

Respectfully submitted,

/s/Diane L. Dragan
Assistant Federal Public Defender
1010 Market Street, Suite 200
St. Louis, Missouri 63101
Telephone: (314) 241-1255
Fax: (314) 421-3177
E-mail: Diane_Dragan@fd.org

Attorney for Defendant Hodzic

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2018, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Assistant United States Attorney Matthew Drake and upon attorneys for all codefendants.

/s/Diane L. Dragan

